

AFFIDAVIT OF DEAN COUCH

I, Dean Couch, being of legal age, hereby deposes and states as follows:

1. I am employed at the Oklahoma Water Resources Board (OWRB) as the agency's general counsel.
2. I was the employee at OWRB who supervised the collection of documents which were responsive to the Poultry Integrator's Interrogatories and Requests for Production of Documents which were served on OWRB. I worked in conjunction with counsel for the State who informed me what documents had been requested by the Defendants.
3. In carrying out this task, I sought the assistance of other OWRB employees within the various divisions, to locate and organize the documents sought by the Poultry Integrators.
4. The documents were pulled from the files and offices of OWRB staff, placed in boxes, and moved to a location within the agency for inspection by the Poultry Integrator lawyers.
5. In addition, the Poultry Integrator lawyers were given access to permanent "rolling" files, as well as to the OWRB's basement library.
6. The documents that were provided for inspection were OWRB's original documents as they are kept in the usual course of business.
7. The documents were not Bates-stamped. However, an index of types of documents was provided at the inspection for use by the Poultry Integrator lawyers. I was available, along with counsel for the State, to answer any questions posed by the lawyers inspecting the documents.




8. Prior to their inspection of the OWRB documents, the Poultry Integrator lawyers deposed me as the agency records custodian. During the deposition, I told them where documents could be located by box and file for each Request for Production.

9. After the documents were inspected by the Poultry Integrator lawyers, the selected documents were sent out to be copied by a copying service. This process is on-going.

10. The original documents are being returned to the OWRB for re-filing.

Further affiant sayeth not.



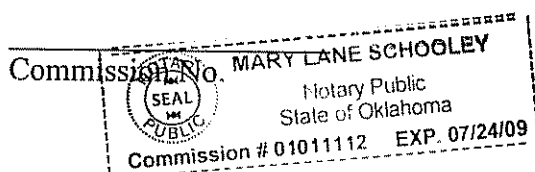
Dean Couch


3/8/07

Date

State of Oklahoma)
)
County of Oklahoma) ss

On this 8 day of March, 2007, the above-referenced individual appeared before me and affixed her signature hereto.





Notary Public

Expiration date